TALKING POINTS – QUALITY OF LIFE PERFORMANCE STANDARDS FOR AIR (7-21-09)

—The Quality of Life Performance Standards (QoLPS) for Air Quality were developed by the EPA to protect the health and safety of the public during the dredging project. General Electric is required to comply with these standards.

—The PCB ambient air quality standard (PCB QoLPS) for residential areas is 0.11 micrograms per cubic meter, over a 24-hour average. This can also be expressed as 110 nanograms per meter cubed (110 ng/m^3) or within an area that is 1 meter tall, 1 meter wide and 1 meter deep.

—New York State agencies, the public, and the federal Natural Resources Trustees were consulted throughout the development of the QoLPS. The standard is protective of residential exposures for children and adults, considering the long term and short term effect of the toxicity of PCBs and the potential risk of cancer from PCB emissions.

—The residential risks associated with air quality for the project are based on a chronic exposure to PCBs by a child (between 0-6 years old) at levels higher than the standard (110 ng/m^3) for 365 days a year for six years.

—The PCB ambient air quality standard for industrial areas (not all areas of the project are adjacent to residential areas) is 0.26 micrograms per cubic meter, over a 24-hour average. This can also be expressed as 260 nanograms per meter cubed.

—To develop the residential standard, EPA used standard risk assessment methodologies, based on the chronic Reference Dose for Aroclor 1016 that is available on EPA's consensus database for toxicity information, the Integrated Risk Information System (IRIS). The exposures to children and adults living near the river during the remedial action were evaluated by considering their Average Daily Dose of exposure including age-specific inhalation rate and bodyweight, a potential residential exposure period, and averaging time. In the residential area, the child was identified as the most sensitive receptor. In addition, the proposed concentrations were evaluated based on potential cancer effects. The resulting cancer risks for both children and adults were shown to be within the acceptable risk range identified within the Superfund program of 10E-4 (one in ten thousand) to 10E-6 (one in a million).

—Weather conditions and PCB concentrations in the sediment resting in barges can influence PCB concentrations in the air. A comprehensive monitoring program is in place to continuously monitor PCB emissions from the processing facility and dredging operations. Results can be viewed at a website dedicated to the various types of monitoring being done for the project: www.hudsondredgingdata.com

—At the processing facility, PCB air monitoring is accomplished with five permanent air sampling stations (4 high volume samplers, 1 low volume sampler) along the perimeter of

most contaminated areas of the river are given priority for offloading at the dewatering facility. Finally, the sediment from these barges is taken directly to a storage structure which is covered and has an air filtration system. Once these steps were implemented, the air monitoring results started to decline and are continuing to do so.